

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In the matter of the Application of

Misc. Case No.: 1:20-mc-00237-JGK

ANA CHRISTINA DEGENS

for an order authorizing the issuance of
subpoenas pursuant to 28 USC 1782 to J.P.
Morgan Chase Bank, N.A., Wells Fargo N.A.,
HSBC Bank USA, N.A., Safra Bank N.A., Favil
LLC, Tavit Group, Ltd., Arvil International
Corp., Kavil Investments Limited, Vilvil Group
Limited, Grant, Herman, Schwartz & Klinger
LLP and Loeb, Block & Partners LLP.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law the accompanying declarations of Alan R. Friedman, Esq. (and exhibits thereto), David Sahargun, Esq. and Eric James, movant Pedro Weil, by and through the undersigned counsel, will move this Court before the Honorable Robert W. Lehbarger, United States Magistrate Judge, at the United States District Court for the Southern District of New York, U.S. Courthouse, 500 Pearl Street, Room 18D, New York, New York 10007, or at such alternative location as the Court may select, on a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 26 and 45 quashing or, in the alternative, modifying the subpoenas authorized by the Court on July 24, 2020 [DE 10].

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule agreed to between the parties and so-ordered by the Court [DE 34], opposition papers, if any, shall be served

on or before October 15, 2020, and reply papers, if any, shall be served on or before October 29, 2020.

Dated: September 24, 2020

Respectfully Submitted,

FOX ROTHSCHILD LLP



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